

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO. 1:24-cv-22751-BLOOM/Elfenbein

DAS NOBEL, EDUARDO MARTINEZ, DANIEL
GRANDE, WILLIAM POU, and DAVID ZIEMEK
on behalf of themselves and on behalf of all other
similarly situated,

Plaintiffs,

vs.

SOUTH FLORIDA STADIUM LLC d/b/a HARD
ROCK STADIUM, MIAMI DOLPHINS, LTD;
COUNTY LINE SOUTH PROPERTIES, LLC;
DOLPHIN CENTER PROPERTIES, LLC;
CONFEDERACIÓN SUDAMERICANA DE
FÚTBOL d/b/a CONMEBOL, CONFEDERATION
OF NORTH, CENTRAL AMERICA AND
CARIBBEAN ASSOCIATION FOOTBALL d/b/a
CONCACAF, and BEST CROWD
MANAGEMENT, INC.,

Defendants.

_____ /

JOINT STATUS REPORT

Plaintiffs Das Nobel, Eduardo Martinez, Daniel Grande, William Pou, and David Ziemek (collectively, “Plaintiffs”) and Defendants South Florida Stadium LLC (“SFS”), Miami Dolphins, Ltd., County Line South Properties, LLC, Dolphin Center Properties, LLC, Confederación Sudamericana de Fútbol, Confederation of North, Central America and Caribbean Association Football (“CONCACAF”), and BEST Crowd Management, Inc. (collectively, “Defendants” and with Plaintiffs, the “Parties”), respectfully submit the following joint status report:

Since filing their September 1, 2025 status report, the Parties have continued to work on finalizing the settlement agreement and are pleased to report to the Court that they have reached

agreement on the terms thereof. In addition, plaintiff's counsel in Garn v. SFS, et al., Case No. 1:24-cv-25087 (S.D. Fla.), has recently confirmed he and his client will join the settlement.¹

Prior to filing for preliminary approval, and pursuant to the settlement agreement, Plaintiffs will seek leave to file the Second Amended Complaint. Thereafter, the Parties will jointly seek a stay of Defendants' deadline to answer the Second Amended Complaint while the Court considers approval of the settlement.

Accordingly, the Parties propose setting a deadline of November 17, 2025 for Plaintiffs to file a motion for preliminary approval for a proposed class settlement of this matter. As before, the settlement agreement remains contingent on the participation of SFS's insurance carriers, but progress has been made in securing that cooperation since the last status report, and the Parties believe that those issues will be resolved by the time the motion for preliminary approval is filed next month.

WHEREFORE, the undersigned respectfully request that the Court set a deadline of November 17, 2025 for Plaintiffs to file a motion for preliminary approval.

¹ Garn is currently before the Eleventh Circuit on the appeal of SFS and CONCACAF vis-à-vis the denial of their motion to compel arbitration by the district court.

Date: October 20, 2025

Respectfully submitted,

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